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UNITED STATES DISTRICT COURT  
For the  
Western District of Oklahoma

QUILL INK BOOKS LIMITED, a  
foreign corporation,  
*Plaintiff*

v.

ABCD GRAPHICS AND DESIGN, D/B/A  
Blushing Books, et al.  
*Defendant*

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Civil Action No. CIV-18-00920-G

**DEFENDANT’S RESPONSES TO PLAINTIFF’S THIRD SET OF DISCOVERY  
REQUESTS**

Defendant ABCD Graphics and Design (“Defendant”) submits the following responses pursuant to FRCP 33, 34, and 36.

**RESPONSES TO INTERROGATORIES**

INTERROGATORY NO. 1: Identify the person who created any comparison of the Myth of Omega and Alpha’s Claim series upon which you relied in filing the DMCA notice(s) against the Myth of Omega series of books.

RESPONSE TO INTERROGATORY NO. 1: The comparison was provided to Defendant by Rachelle Soto as email attachment spreadsheets. No other individual creating a comparison prior to the filing of DMCA notices is known to Defendant. Regarding the spreadsheet, entitled “Crave to Conquer Paraphrasing,” Soto does not identify an author and only states that it was prepared by a “good friend.” In an email chain which runs from April 15<sup>th</sup> through April 30<sup>th</sup>, 2018, two separate copies are provided to Defendant. In spite of having the same title, the spreadsheets (from April

19<sup>th</sup> and then from April 24<sup>th</sup> – sent only to Allison Travis) the second spreadsheet is slightly different. In addition, Soto provides a plot / story arc comparison directly in email which differs slightly from the information on the spreadsheets. She states that she “typed it out” and does not identify a source for her information.

INTERROGATORY NO. 2: Identify the person who contacted Draft2Digital LLC in Oklahoma following the filing of the DMCA notices against the Myth of Omega series of books.

RESPONSE TO INTERROGATORY NO. 2: Defendant has never contacted, communicated with, spoken to, or received any emails from anyone at Draft 2 Digital, LLC in Oklahoma. Plaintiff has insisted that Defendant has communicated with Draft 2 Digital. This is not true.

INTERROGATORY NO. 3: Identify any policy of insurance coverage possessed by you that may provide coverage for Quill Ink’s claims against you.

RESPONSE TO INTERROGATORY NO. 3: None. Defendant has no insurance policies.

INTERROGATORY NO. 4: Identify any and all assets possessed by you capable of satisfying a judgment against you with respect to Quill Ink’s claims against you.

RESPONSE TO INTERROGATORY NO. 4: Defendant has no assets capable of satisfying a judgment against the. Defendant has about 10,000 in equity in their building against 120,000 in debt. In addition, the business has legal debt in excess of 50,000.

INTERROGATORY NO. 5: Identify the income you have earned from sales of the Alpha's Claim series.

RESPONSE TO INTERROGATORY NO. 5: Defendant's gross receipts for the Alpha's Claim series are approximately \$370,000. After initial production costs, which Defendant calculates at \$1500 per titles (\$6000.), payment of royalties to Soto (approximately \$185,000), legal costs in excess of \$100,000, and their advertising expense (25,000 to 30,000), Defendant's net revenue on this series is less than \$50,000.

INTERROGATORY NO. 6: Identify who you contacted or communicated with regarding the filing of the DMCA notices against the Myth of Omega series of books.

RESPONSE TO INTERROGATORY NO. 6: Defendant CEO and Allison Travis contacted and communicated regarding filing the DMCA notices with each other, with Rachelle Soto, and with staff members Michael Godsey and contract editor Sabrina Wohlers. Defendant CEO sent an email to Zuri Amarcya on 5/29 communication concerning the DMCA notices. Defendant also communicated with Attorney Margarita Coale in response to the Cease and Desist Attorney Coale sent for Zuri Amarcya/ Zoey Ellis on May 25, 2018.

INTERROGATORY NO. 7: Identify the income you have earned from any work published by you that involves Omegaverse themes.

RESPONSE TO INTERROGATORY NO. 7: Defendant's gross revenue for all Omegaverse titles is approximately \$422,000. After production costs, (\$10,000) payment of royalties (approximately \$211,000) and advertising expense (\$40,000), Defendant's net revenue on titles with Omegaverse themes is \$160,000. Defendant has paid

approximately \$100,000 in legal fees related to this lawsuit, and owes approximately \$50,000 more.

INTERROGATORY NO. 8: Identify any policy of insurance for director or officer liability that in any way relates to the operations of Blushing Books.

RESPONSE TO INTERROGATORY NO. 8: Blushing Books is an imprint of ABCD Graphics and Design. Defendant has no insurance policies for directors or officers.

INTERROGATORY NO. 9: Identify all officers and/or directors of Blushing Books, including their addresses.

RESPONSE TO INTERROGATORY NO. 9: Anne Wills is the only owner and officer of ABCD Graphics and Design. She can be reached via the corporate address of 977 Seminole Trail #233, Charlottesville, VA 22901.

INTERROGATORY NO. 10: Identify who you contacted at Draft2Digital, L.L.C. in Oklahoma.

RESPONSE TO INTERROGATORY NO. 10: No officer, director or employee, or anyone acting on the behalf of Defendant has ever spoken to anyone at Draft2Digital, L.L.C in Oklahoma.

INTERROGATORY NO. 11: Identify who Rachelle Soto a/k/a Addison Cain (Cain) contacted at Draft2Digital, L.L.C. in Oklahoma.

RESPONSE TO INTERROGATORY NO. 11:

Defendant has no knowledge of Rachelle Soto's contacting Draft2Digital.

INTERROGATORY NO. 12: Identify anyone who you discussed the DMCA notices with, not including legal counsel.

RESPONSE TO INTERROGATORY NO. 12:

Defendant CEO and Allison Travis discussed the DMCA notices with each other, with Rachelle Soto, and with employee Michael Godsey and contractor Sabrina Wohlers. Defendant CEO sent an email to Zuri Amarcya on 5/29 discussing the DMCA notices. Defendant also discussed via email the issue with Margarita Coale in response to the Cease and Desist she sent for Zuri Amarcya/ Zoey Ellis on May 25, 2018. After lawsuit was filed in October 2018 and Plaintiff-sponsored website was publicized publicly, general outlines of the case were shared with editors and other contracted staff of Defendant.

INTERROGATORY NO. 13: Identify any and all telephone calls, including the date where you contacted Cane within three (3) months of filing of the DMCA notices until you were served with the instant lawsuit.

RESPONSE TO INTERROGATORY NO. 13: Defendant CEO and Allison Travis may have spoken to Rachelle Soto via Defendant's Uberconference system. However, the Uberconference system does not retain records of participants in calls if participants were invited based on email address and/or called in using computers (instead of phone), so no records exist.

INTERROGATORY NO. 14: Identify any online groups operated by Cain.

RESPONSE TO INTERROGATORY NO. 14:

According to public Facebook listings, Cain operates the following groups:

- 1) Addison Cain's Dark Longings Lounge – Defendant employee Allison Travis is a member of this group.
- 2) Addison Cain's Vegas Trip Attendees
- 3) Cain has an Omegaverse group entitled Omegaverse Readers Unite.

INTERROGATORY NO. 15: Identify all members of any online group in which you share membership with Cain.

RESPONSE TO INTERROGATORY NO. 15:

Defendant's CEO and other employees are in no online groups with Cain. Defendant employee Allison Travis is a member of Addison Cain's Dark Longings Lounge.

INTERROGATORY NO. 16: Identify who was responsible for creating the GoFundMe campaign for Cane with respect to the claims against you and her for filing the false DMCA notices.

RESPONSE TO INTERROGATORY NO. 16:

No one at Defendant's company was involved in the creation of the GoFundMe Campaign in any way. The GoFundMe campaign was not created for legal claims against Defendant. Defendant has never received funds from this campaign. Publicly, the creator was identified as Jennifer Bene, and this is the limit of information. Whether anyone else was involved, Defendant has no knowledge.

INTERROGATORY NO. 17: Identify all employees of Blushing Books, including their address.

RESPONSE TO INTERROGATORY NO. 17:

Blushing Books is an imprint of ABCD Graphics and Design and has no employees.

Defendant ABCD Graphics and Design's employees are:

Allison Travis, Michael Godsey, Kimberly Mina, as well as Anne Wills. All can be contacted via ABCD Graphics and Design's corporate address at: 977 Seminole Trail #233, Charlottesville, VA 22901.

INTERROGATORY NO. 18: Identify who is responsible for managing or accounting for Blushing Books' finances.

RESPONSE TO INTERROGATORY NO. 18:

Blushing Books is an imprint of ABCD Graphics and Design and has no accounting or finances. Defendant ABCD Graphics and Design's accounting is managed by Defendant CEO Anne Wills. Allison Travis and Michael Godsey manage the quarterly accounting process by which the authors' royalty statements are generated. In addition, a CPA firm prepares Defendant's yearly tax returns and manages their payroll filings.

INTERROGATORY NO. 19: Identify all bank accounts used by Blushing Books.

RESPONSE TO INTERROGATORY NO. 19:

Blushing Books is an imprint of ABCD Graphics and Design and has no bank accounts. Defendant ABCD Graphics and Design's has two bank accounts. They are both at Bank of America, both operating under the same EIN, and they are both checking accounts.

INTERROGATORY NO. 20: Identify the email service used by Blushing Books.

RESPONSE TO INTERROGATORY NO. 20:

Blushingbooks.com is managed by Google gmail.

INTERROGATORY NO. 21: Identify the location of any messages or files relating to the DMCA notices filed against the "Zoey Ellis" brand of books.

RESPONSE TO INTERROGATORY NO. 21:

All emails messages are served within gmail. All files are contained within Defendant's Dropbox service.

INTERROGATORY NO. 22: Identify any forum where Cain published comments about the "Zoey Ellis" brand of books.

RESPONSE TO INTERROGATORY NO. 22:

To the best of Defendant's knowledge, Rachelle Soto published comments on her own website and on Facebook. Defendant has no knowledge of any posting Soto may have made to private groups or to private individuals.

INTERROGATORY NO. 23: Identify what resources you claim to have used to estimate the damage caused by the filing of the DMCA notices against the "Zoey Ellis" brand of books.

RESPONSE TO INTERROGATORY NO. 23:

Defendant does not believe that the filing of the DMCA notices caused any damage to the "Zoey Ellis" brand of books, or Plaintiff Quill.

Defendant has published many books over the last twenty years and can estimate what the revenue would have been on Barnes & Noble, Apple and Kobo during the approximately two month period the books were under review (and thus unavailable) on those sites, using a variety of means.



First, sales on these sites is a consistent and predictable percentage of Amazon sales. Furthermore, Amazon sales ranks are a highly predictive indicator of sales. As the titles were never removed from Amazon, the vendor responsible for typically 85% or more of revenue, the impact of the removal of these books is minimal. During the time of the review process of the infringing titles in question, the Zoey Ellis titles were ranked on Amazon far less favorably than many of Blushing Books' Publications, and comparable income numbers are available for those titles; thus, very accurate conclusions can be drawn that the Ellis titles made less money than those titles.

Defendant ran comparisons to multiple of Defendant's titles on Amazon, Barnes and Noble, and Apple. During the same time period the infringing titles were under review (Second Quarter of 2018), Barnes & Noble, Apple, and Kobo sales combined on the top books in Defendant's catalog varied between 1% and 8% of the Amazon sales, for the entire quarter. The TOP SELLING single author title for Defendant for Second Quarter 2018 had gross revenue of around \$500 for Apple, Barnes & Noble, and Kobo for the entire Second Quarter. There is no reason to assume that Plaintiff's sales would have a different pattern.

INTERROGATORY NO. 24: Identify any mobile electronic device used to communicate with Cain regarding the "Zoey Ellis" brand of books.

RESPONSE TO INTERROGATORY NO. 24: Defendant's CEO's cell phone (number (434) 989-3635) through AT&T was used to communicate with Rachelle Soto.

INTERROGATORY NO. 25: Identify any online or electronic backup service used to back up your electronic business assets.

RESPONSE TO INTERROGATORY NO. 25:

Defendant uses Dropbox backup service.

INTERROGATORY NO. 26: Identify all contracts or other receivables upon which Blushing Books earns income which may be used to satisfy any judgment that may be entered against Blushing Books in this lawsuit.

RESPONSE TO INTERROGATORY NO. 26:

Defendant CEO Anne Wills states that Defendant has approximately 3,000 active book contracts with approximately 450 authors. The Defendant earns money after the books sell. Defendant's CEO states that there are no contracts that exist which guarantee any money being paid to the company.

INTERROGATORY NO. 27: Identify any investment accounts used by Blushing Books to fund its operations.

RESPONSE TO INTERROGATORY NO. 27:

Blushing Books is an imprint of Defendant ABCD Graphics and Design. Defendant has no investment accounts.

INTERROGATORY NO. 28: Identify all physical assets held by Blushing Books which may be used to satisfy any judgment that may be entered against Blushing Books in this lawsuit.

RESPONSE TO INTERROGATORY NO. 28:

Blushing Books is an imprint of Defendant ABCD Graphics and Design. Defendant ABCD Graphics and Design has roughly \$10,000 in equity in an office building, as well as printers, computers and coffee makers, valued at less than \$5000.

INTERROGATORY NO. 29: If you do not have any insurance coverage for Blushing Books business activities, identify any other sources of funds that may be set aside for payment of its liabilities.

RESPONSE TO INTERROGATORY NO. 29:

Defendant has no funds set aside for payments of liabilities. The only funds that may be available to set aside for payment of any liabilities would be its ongoing corporate revenue. If Defendant has an extensive liability payment imposed on it, Defendant will be forced to file for bankruptcy.

INTERROGATORY NO. 30: State what you and Cain sought to gain through the filing the DMCA notices against the "Zoey Ellis" brand of books published by Quill Ink.

RESPONSE TO INTERROGATORY NO. 30:

Defendant cannot speak for non-party Cain. Defendant neither sought to gain any monetary or financial benefit from filing the DMCA notices, nor expected any.

Defendant in support of Author Soto's wishes, and to satisfy the requests of Author Soto, sought only to have the infringing titles removed from sale.

**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:**

Produce the entirety of any and all drafts and final manuscripts for the Alpha's Claim series of books.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

Both the original (submitted) manuscript and the final edited version of these manuscripts have already been provided in full. No additional drafts are available.

**REQUEST FOR PRODUCTION NO. 2:**

To the extent not already produced, produce any and all documents showing all sales, income, and earnings for Cain's Alpha's Claim series (*Born to be Bound*, *Born to be Broken*, *Reborn*, and *Stolen*).

**RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

Defendant receives no statements from vendors that are broken down by author. Rather, all titles published are included on every statement. For each month, Defendant receives eleven separate statements from Amazon alone, and each of the statements contain countless lines of sales from other authors which would require redaction before the statement could be shared with an outside party. Defendant has prepared a summary spreadsheet of all quarters of sales since Author Soto began publishing with Defendant in April of 2016. (Gross Receipts Alpha's Claim).

**REQUEST FOR PRODUCTION NO. 3:**

To the extent not already produced, produce any and all documents showing all sales, income, and earnings for any other works by an author affiliated with Blushing Books that is written in the Omegaverse style or genre.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Objection—privileged, overly broad, unduly burdensome, and involves sensitive third party information. Because Defendant does not have the authority to disclose confidential personal and financial information regarding third parties, Defendant will provide these documents for the court to review in camera and assess the relevance. Plaintiff also can inquire directly of Witness Cain at trial on these topics.

Defendant receives no statements from vendors that are broken down by author. Rather, all titles published are included on every statement. For each month, Defendant receives eleven separate statements from Amazon alone, and each of the statements contain countless lines of sales from other authors which would require redaction before the statement could be shared with an outside party.

Defendant has prepared a summary spreadsheet of all quarters of sales for all titles published by Defendant in the Omegaverse genre. (“Gross Receipts All Omegaverse”).

REQUEST FOR PRODUCTION NO. 4:

To the extent not already produced, produce any and all documents Blushing Books has obtained about sales, income, and earnings for Quill Ink’s “Zoey Ellis” brand of books.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Defendant has obtained no documents whatsoever concerning sales, income, and earnings for Quill Ink’s “Zoey Ellis” brand of books.

REQUEST FOR PRODUCTION NO. 5:

To the extent not already produced, produce financial statements for Blushing Books for 2018 and 2019.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Defendant has provided 2018 Profit and Loss statements for ABCD Graphics and Design. No financial statements for 2019 are available.

REQUEST FOR PRODUCTION NO. 6:

To the extent not already produced, produce all copies of any insurance policy in effect for Blushing Books during 2018 and 2019.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

None. Defendant has no insurance policies whatsoever. Defendant purchased a small office building in Farmville, Virginia in February of 2019 and holds standard property insurance, as required by mortgage company.

REQUEST FOR PRODUCTION NO. 7:

To the extent not already produced, produce any and all communications sent to or received from any person regarding sales, earnings for Quill Ink “Zoey Ellis” brand of books.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Defendant has received no communications sent or received from any person regarding sales, income, and earnings for Quill Ink’s “Zoey Ellis” brand of books.

REQUEST FOR PRODUCTION NO. 8:

To the extent not already produced, produce any and all documents showing compensation whether direct, royalty or otherwise, paid to Cain for all pre-orders and other sales of her Alpha's Claim series (*Born to be Bound*, *Born to be Broken*, *Reborn*, and *Stolen*).

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Objection—privileged material, and involves disclosure of sensitive third party information. Because Defendant does not have the authority to disclose confidential personal and financial information regarding third parties, Defendant will provide these documents for the court to review in camera and assess the relevance. Plaintiff also can inquire directly of Witness Cain at trial on these topics. A spreadsheet entitled “Royalties to Cain” has been prepared.

REQUEST FOR PRODUCTION NO. 9:

To the extent not already produced, produce any and all documents, including communications between Blushing Books and Cain, regarding or relating to the decision to remove and subsequent removal of Cain’s publications from Blushing Books online store.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Objection—privileged and sensitive third party information. Under a confidential rights reversion agreement, all rights for Cain’s publications have been returned to her.

Defendant had no communications with anyone other than counsel during the negotiation process. Because Defendant does not have the authority to disclose confidential personal

and financial information regarding third parties, Defendant will provide these documents for the court to review in camera and assess the relevance. Plaintiff also can inquire directly of Witness Cain at trial on these topics.

REQUEST FOR PRODUCTION NO. 10:

Produce a copy of your tax returns for 2018 and 2019.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

No tax return has been filed for 2019. Tax return for 2018 is in process and is not available.

REQUEST FOR PRODUCTION NO. 11:

Produce a copy of any and all organizational documents, including operating agreements, for Blushing Books.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Defendant has no organizational documents or operating agreements. Original corporate documents for ABCD Graphics and Design were produced in 1999, Defendant CEO has moved five times since October 1999, and original documents cannot be located.

REQUEST FOR PRODUCTION NO. 12:

Produce any public registration for your entity, including any state where you are registered to do business.

RESPONSE TO REQUEST FOR PRODUCTION NO 12:

ABCD Graphics and Design Inc. is a Virginia corporation. Virginia SCC corporate filing has been provided.

REQUEST FOR PRODUCTION NO. 13:



Produce the ownership records for any and all shares of Blushing Books.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Blushing Books is not a corporation and has no shares. Original corporate documents for ABCD Graphics and Design were produced in 1999, Defendant CEO has moved five times since October 1999, and original documents cannot be located.

REQUEST FOR PRODUCTION NO. 14:

Produce your detailed phone records beginning three (three) months before the filing of the DMCA notices against the Zoe was brand of books up to the notice of the filing of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

ABCD Graphics and Design does not now and has never had a business phone. All phone calls occur over the Uberconference conference system. A download of the dates in question has been provided with the file name "Uber Call Log."

**REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 1:**

Admit Blushing Books filed a false DMCA notice against the “Zoey Ellis” brand of books published by Quill Ink.

**RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

Denied. Defendant filed DMCA notices in good faith, believing that author Zuri Amarcya a.k.a. Zoey Ellis’ titles infringed on Rachelle Soto a.k.a. Addison Cain’s Alpha’s Claim series.

**REQUEST FOR ADMISSION NO 2:**

Admit Blushing Books conspired to defame the "Zoey Ellis" brand of books published by Quill Ink.

**RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

Denied. Defendant collaborated with author Rachelle Soto a.k.a. Addison Cain in producing an honest assessment of the similarities between Cain’s Alpha’s Claim series and Ellis’s infringing Myth of Omega series.

**REQUEST FOR ADMISSION NO. 3:**

Admit Blushing Books acted against the “Zoey Ellis” brand of books published by Quill Ink at the instructions of Cain.

**RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

Admitted with stipulations. Cain was responsible for originally bringing the infringing titles to Defendant’s attention, and provided the bulk of the research on which the DMCA notices were filed. However, Defendant denies “acting against” the “Zoey Ellis” brand of

books. Defendant collaborated with Cain in filing legitimate and researched DMCA notices against infringing titles.

REQUEST FOR ADMISSION NO. 4:

Admit Cain participated in the filing of the false DMCA notices against the "Zoey Ellis" brand of books published by Quill Ink.

RESPONSE TO REQUEST FOR ADMISSION NO. 4:

Denied. While Cain provided the information upon which the DMCA notices were based, to the best of Defendant's knowledge Cain believed that the Zoey Ellis brand of books infringed on her titles.

REQUEST FOR ADMISSION NO. 5:

Admit the "Zoey Ellis" brand of books published by Quill Ink suffered damages because of the filing of the false DMCA notices.

RESPONSE TO REQUEST FOR ADMISSION NO. 5:

Denied. Because the books were never removed from Amazon, the vendor responsible for 85 – 90% of all sales, because sales on the secondary channels accounted for less than 10% of the sales of the Amazon channel, and because controversy often actually sells books, there is no proof whatsoever that the DMCA notices harmed the "Zoey Ellis" brand of books published by Quill Ink. All negative publicity concerning this matter, at least prior to the filing of the current lawsuit, was posted by Plaintiff, not Defendant.

REQUEST FOR ADMISSION NO. 6:

Admit Cain defamed the "Zoey Ellis" brand of books published by Quill Ink with the intent to harm the brand's reputation.

RESPONSE TO REQUEST FOR ADMISSION NO. 6:

Denied. While Defendant cannot speak for Cain, the intent of Defendant in filing the DMCA notices was to have infringing material removed from sale.

REQUEST FOR ADMISSION NO. 7:

Admit Cain defamed the “Zoey Ellis” brand of books published by Quill Ink with the intent to destroy the brand's value.

RESPONSE TO REQUEST FOR ADMISSION NO. 7:

Denied. While Defendant cannot speak for Cain, the intent of Defendant in filing the DMCA notices was to have infringing material removed from sale.

REQUEST FOR ADMISSION NO. 8:

Admit Cain timed the DMCA notices to cause cancellations of pre-orders for the “Zoey Ellis” brand of books published by Quill Ink.

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

Denied. While Defendant cannot speak for Cain, the intent of Defendant in filing the DMCA notices was to have infringing material removed from sale. On Defendant’s part there was no timing specifically related to any pre-order.

REQUEST FOR ADMISSION NO. 9:

Admit the Myth of Omega series (*Crave to Conquer, Crave to Capture, and Crave to Claim*) is different from the Alpha’s Claim Series. (*Born to be Bound, Born to be Broken, Reborn, and Stolen*).

RESPONSE TO REQUEST FOR ADMISSION NO. 9:

Admitted with stipulations. The titles are different. Defendant has never claimed that the titles are verbatim or identical copies of each other. However, Defendant believes that the first two titles in Zoey Ellis' Myth of Omega series were written using the first two titles of Addison Cain's Alpha's Claim series as a template / outline and that the two sets of two books contain dozens of specific plot points occurring in the same sequences.

REQUEST FOR ADMISSION NO. 10:

Admit Blushing Books advised Cain against filing the DMCA notices against the "Zoey Ellis" brand of books published by Quill Ink.

RESPONSE TO REQUEST FOR ADMISSION NO. 10:

Admitted. Defendant encouraged Soto to consider strongly the potential consequences of taking action against another author, whether that author was harming her or not.

REQUEST FOR ADMISSION NO. 11:

Admit the "Zoey Ellis" brand of books published by Quill Ink has been permanently damaged by false accusations of plagiarism.

RESPONSE TO REQUEST FOR ADMISSION NO. 11:

Denied. Defendant never spoke publicly about accusations of plagiarism. On the contrary, Plaintiff posted widely, including creating a public website, about the infringement accusation. Defendant's position is that any damage done must be laid fully at Plaintiff's own doorstep.

REQUEST FOR ADMISSION NO. 12:

Admit Quill Ink is entitled to recover all damages from the filing of the false DMCA notices against the “Zoey Ellis” brand of books published by Quill Ink.

RESPONSE TO REQUEST FOR ADMISSION NO. 12:

Denied. Defendant believed at the time of the filing and continues to believe that Zoey Ellis “Myth of Omega” series infringed on Addison Cain’s “Alpha’s Claim” series and that Zoey Ellis is entitled to no damages whatsoever in this matter.

REQUEST FOR ADMISSION NO. 13:

Admit other individuals were involved with the filing of the false DMCA notices against the “Zoey Ellis” brand of books published by Quill Ink.

RESPONSE TO REQUEST FOR ADMISSION NO. 13:

Denied. “Other individuals” is vague and meaningless. Defendant has no knowledge whatsoever that any other individuals were involved with the filing of the DMCA notices, other than itself and Rachelle Soto.

REQUEST FOR ADMISSION NO. 14:

Admit other individuals were involved with the filing of the false DMCA notices against the “Zoey Ellis” brand of books published by Quill Ink.

RESPONSE TO REQUEST FOR ADMISSION NO.14:

Request is identical to No. 13.

REQUEST FOR ADMISSION NO. 15:

Admit other individuals were involved with the filing of the false DMCA notices against the “Zoey Ellis” brand of books published by Quill Ink.

RESPONSE TO REQUEST FOR ADMISSION NO.15:

Request is identical to No. 13.

REQUEST FOR ADMISSION NO. 16:

Admit Cain instructed you to lie about her involvement in directing the filing of the DMCA notices against the Myth of Omega series of books.

RESPONSE TO REQUEST FOR ADMISSION NO.16:

Denied with exceptions. While Soto never asked Defendant to lie about any matter, Defendant and Soto did discuss Soto's "hiding behind" her publisher if confronted on social media about the DMCA filings. Subsequent to that conversation, Soto of her own accord and volition filed at least one additional DMCA take down notice.

REQUEST FOR ADMISSION NO. 17:

Admit the purpose of the DMCA notices filed against the Myth of Omega series of books were intended to destroy Quill Ink's ability to market the "Zoey Ellis" brand of books.

RESPONSE TO REQUEST FOR ADMISSION NO.17:

Denied. Defendant believed at the time of the filing and continues to believe that Zoey Ellis "Myth of Omega" series infringed on Addison Cain's "Alpha's Claim" series.

Defendant nevertheless never acted against Zoey Ellis and had never heard of Quill Ink. Defendant's initial letter to Zuri Amarcya laid out a plan for her to remove the Myth of Omega titles from sale while maintaining her accounts on Amazon and other vendors in good standing and retaining all income from sales of the titles to that point.

REQUEST FOR ADMISSION NO. 18:

Admit you failed to disclose insurance policies you have that may provide coverage for Quill Ink's claims against you.

RESPONSE TO REQUEST FOR ADMISSION NO.18:

Denied. Defendant has no insurance policies.

REQUEST FOR ADMISSION NO. 19:

Admit you and Cain developed a plan to conceal Cain's involvement in the filing of the DMCA notices against the Myth of Omega series of books.

RESPONSE TO REQUEST FOR ADMISSION NO.19:

Denied. Although in April 2018, Defendant and Soto exchanged emails containing a possible Facebook post that Soto proposed making after the "backlash" hit, and Defendant advised Soto that she could hide behind her publisher, in a subsequent conference call, Defendant advised Soto that she had reconsidered and that Defendant wanted Soto to make no public statement regarding the matter, a decision which Soto respected. Furthermore, at the time of this exchange, Soto had not, to the best of Defendant's knowledge, filed any DMCA notices. At no point did Defendant ever develop a "plan" to "conceal" Soto's involvement.

REQUEST FOR ADMISSION NO. 20:

Admit neither you nor Cain have the right to exclude anyone from writing male/female Omegaverse stories.

RESPONSE TO REQUEST FOR ADMISSION NO.20:

Admitted. While Defendant cannot speak for Cain, Defendant has never attempted to exclude anyone from writing in the m/f Omegaverse universe.



REQUEST FOR ADMISSION NO. 21:

Admit the attacks against Quill Ink's counsel have absolutely no relevance to the merits of Quill Ink's Claims against you.

RESPONSE TO REQUEST FOR ADMISSION NO.21:

Denied on multiple fronts. Defendant is not aware of any attacks against Quill Ink's counsel, Mr. Lincecum, has not made any attacks, and cannot understand the connection between the alleged attacks and the merits of the claims. Nevertheless, Zuri Amarcya's initial counsel, Margarita Coale, has a long standing adversarial relationship both with Soto and Defendant, predating by several years the publication of the "Zoey Ellis" titles. Defendant believes that Ms. Coale may have reached out to Zoey Ellis specifically to represent her with the intent of harming Defendant and Soto. Defendant believes that any involvement of Ms. Coale in this matter taints this case.

REQUEST FOR ADMISSION NO. 22:

Admit you are responsible for all losses related to the filing of the false DMCA notices against the "Zoey Ellis" brand of books.

RESPONSE TO REQUEST FOR ADMISSION NO.22:

Denied on multiple fronts. Based on the information Defendant was provided by Cain and their own research, Defendant filed DMCA notices in good faith against infringing titles. The DMCA guidelines do not require removal of infringing material during the review process, and in fact neither Amazon nor Google ever removed the books from sale. Furthermore, in Defendant's experience as publishers it has been noted that

controversy often sells books. Finally, the extremely modest loss of sales on Barnes & Noble, Apple, and Kobo might well have been made up by increased sales on Amazon.

REQUEST FOR ADMISSION NO. 23:

Admit you persisted in filing DMCA notices against the “Zoey Ellis” brand of books after being informed that the DMCA notices were frivolous at best.

RESPONSE TO REQUEST FOR ADMISSION NO.23:

Denied. Defendant filed DMCA notices believing that the “Zoey Ellis” brand of books infringed on Cain’s titles and continues to hold this belief. Defendant was never informed by anyone that the notices were “frivolous.”

REQUEST FOR ADMISSION NO. 24:

Admit some vendors rejected the DMCA notices as meritless and refused to remove the Zoey Ellis brand of books from sale.

RESPONSE TO REQUEST FOR ADMISSION NO.24:

Denied. No vendor rejected the DMCA notices as “meritless.” Vendors are not required to remove books during a DMCA review. One vendor that chose not to remove the titles said they would not do so without a finding from a copyright court. (Google Play) A second vendor (Amazon) never responded to either Defendant’s online filed take-down request or a mailed take down request. Defendant cannot speculate on why some vendors removed the infringing titles and others did not.

REQUEST FOR ADMISSION NO. 25:

Admit that Cain became angry about the response from online vendors and began making claims of plagiarism just to force online vendors to reconsider their rejection of the DMCA notices.

RESPONSE TO REQUEST FOR ADMISSION NO.25:

Admit with stipulations. Cain did become angry and frustrated over lack of movement on Amazon's part. However, "claims of plagiarism" were made from the very initial days of the action, and were the basis of the action.

REQUEST FOR ADMISSION NO. 26:

Admit you traveled to Oklahoma for purposes of contacting and/or discussing the DMCA notices with Draft2Digital, L.L.C.

RESPONSE TO REQUEST FOR ADMISSION NO.26:

Denied. No one affiliated with Defendant has been to Oklahoma ever and no one affiliated with Defendant has ever communicated with Draft2Digital.

REQUEST FOR ADMISSION NO. 27:

Admit Cain contacted online vendors regarding the DMCA notices filed against the Zoey Ellis brand of books.

RESPONSE TO REQUEST FOR ADMISSION NO.27:

Admit with stipulations. Cain informed Defendant she had filed notices with Amazon.

Whether they were "DMCA" notices or "copyright" notices is not entirely clear.

Furthermore, it is unknown by Defendant whether Cain continued any dialogue with vendors "regarding" the notices.

REQUEST FOR ADMISSION NO. 28:

Admit Cain misrepresented her involvement with the filing of the DMCA notices against the “Zoey Ellis” brand of books to the United States District Court for the Western District of Oklahoma.

RESPONSE TO REQUEST FOR ADMISSION NO.28:

Admitted. Cain misrepresented her involvement.

REQUEST FOR ADMISSION NO. 29:

Admit you and Cain used this attack against the "Zoey Ellis" brand of books to increase awareness of and profits relating to the sales of Cain’s Alpha Claim series.

RESPONSE TO REQUEST FOR ADMISSION NO.29:

Denied. Neither Defendant nor, to the best of its knowledge, Cain ever posted about this matter publicly in any way until after the filing of the lawsuit in October 2018.

Defendant’s objective was to have infringing material removed from sale.

REQUEST FOR ADMISSION NO. 30:

Admit you and Cain launched campaigns to preempt and interrupt the releases of any publications for the "Zoey Ellis" brand of books following the filing of the DMCA notices.

RESPONSE TO REQUEST FOR ADMISSION NO.30:

Denied. Except as admitted above in the filing of the five DMCA notices (and the follow up letter to Amazon) Defendant launched no “campaigns” to preempt and interrupt the releases of the publication of any titles.

DATED this 12<sup>th</sup> day of August, 2019.

Respectfully Submitted,



/s/ Rebecca Briggs

**Rebecca Briggs, #40626 (CO) & #91362 (VA)**  
(Also licensed in the Federal Western District of  
Oklahoma)

Attorney for ABCD GRAPHICS AND  
DESIGN/Blushing Books

The Law Office of Becky Briggs, LLC  
315 Colorado Ave, Pueblo, CO 81003

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7050

E-mail: beckybriggslaw@gmail.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of August, 2019, I mailed the attached documents by  
United States Postal Service to:

Gideon A. Lincecum  
Holladay & Chilton, PLLC  
204 N. Robinson, Suite 1550  
Oklahoma City, Oklahoma 73102



/s/ Rebecca Briggs,

**Rebecca Briggs, #40626 (CO) & #91362 (VA)**

uber\_call\_log

start_time	end_time	duration	title	participants	recordings	chat
8/5/19 15:00	8/5/19 15:42	41 min		Unknown;Bethany;Lorelei;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown		
7/29/19 17:00	7/29/19 17:13	13 min		Unknown;Bethany;Bethany		
7/29/19 15:01	7/29/19 15:04	2 min		Unknown;Unknown		
7/15/19 15:00	7/15/19 15:39	38 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Bethany;Lorelei		
7/8/19 15:00	7/8/19 15:28	27 min		Unknown;Unknown;Unknown;Unknown;Bethany;Bethany;Unknown		
7/1/19 14:58	7/1/19 15:28	30 min		Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown		
6/28/19 19:44	6/28/19 21:09	84 min	Little's Box Set	Maren;Unknown;Bethany;Bethany		
6/24/19 15:00	6/24/19 15:19	18 min		Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown		
6/10/19 15:00	6/10/19 16:18	77 min		Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Bethany		
6/7/19 14:59	6/7/19 15:14	14 min	Inkelinger promo	Unknown;Unknown		
6/3/19 15:00	6/3/19 15:34	33 min		Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Bethany;Unknown;Unknown		
5/14/19 14:03	5/14/19 15:00	57 min	Legal	Unknown;Bethany;Unknown		
5/6/19 15:00	5/6/19 15:36	36 min		Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown		
4/29/19 14:59	4/29/19 15:24	24 min		Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown		
4/22/19 15:00	4/22/19 15:55	55 min		Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown		
4/22/19 14:00	4/22/19 14:43	43 min		Bethany;Unknown;Unknown		
4/18/19 13:59	4/18/19 15:07	67 min		Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown		
3/27/19 18:26	3/27/19 18:57	31 min		Bethany;Unknown;Bethany		
3/25/19 15:00	3/25/19 16:05	64 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Bethany;Bethany		
3/4/19 16:00	3/4/19 16:33	32 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown		
2/25/19 16:00	2/25/19 16:19	19 min		Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown		
2/20/19 16:02	2/20/19 16:07	4 min		Unknown;Unknown		
2/11/19 15:59	2/11/19 16:39	39 min		Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown		
2/8/19 16:00	2/8/19 17:41	101 min		Unknown;Unknown;Bethany		
2/4/19 16:00	2/4/19 16:45	45 min		Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown		
2/4/19 15:34	2/4/19 15:46	11 min		Bethany;Unknown		
1/28/19 16:00	1/28/19 16:55	54 min		Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown		

1/23/19 16:00	1/23/19 16:41	41 min		Unknown;Unknown;Bethany;Unknown;Unknown;Unknown		
1/18/19 15:29	1/18/19 15:49	20 min	SF email	Anna;Bethany;Bethany		
1/17/19 17:00	1/17/19 17:31	30 min		Unknown;Unknown;Bethany;Unknown;Unknown		
1/16/19 15:59	1/16/19 17:31	91 min	Anya Summers	Unknown;Bethany;Unknown;Unknown		
1/16/19 15:00	1/16/19 15:30	30 min	Print book update	Bethany;Unknown;Unknown;Unknown;Unknown		
1/14/19 15:57	1/14/19 16:52	55 min		Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown		
1/7/19 19:28	1/7/19 20:38	70 min		Unknown;Unknown;Bethany		
1/7/19 17:00	1/7/19 18:32	91 min		Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
12/17/18 16:00	12/17/18 16:36	37 min		Unknown;Unknown;Unknown;Unknown;Unknown;Bethany		
12/3/18 16:01	12/3/18 16:52	51 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany		
11/28/18 15:59	11/28/18 16:56	59 min		Unknown;Unknown;Unknown;Bethany;Unknown		
11/26/18 15:30	11/26/18 16:42	71 min		Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
11/23/18 16:29	11/23/18 17:26	60 min		Unknown;Bethany		
11/19/18 16:01	11/19/18 17:37	96 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown		
11/7/18 15:59	11/7/18 16:56	56 min		Unknown;Unknown;Bethany;Unknown;Unknown;Unknown		
10/29/18 14:45	10/29/18 16:33	107 min		Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
10/22/18 14:59	10/22/18 16:56	59 min		Elain;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown		
10/18/18 1:38	10/18/18 2:45	67 min		Bethany;Addison		
10/1/18 15:00	10/1/18 15:09	8 min		Unknown;Unknown;Unknown		
9/25/18 15:01	9/25/18 15:35	34 min		Unknown;Bethany;Unknown;Unknown;Unknown;Unknown		
9/18/18 17:00	9/18/18 17:18	17 min		Unknown;Bethany;Unknown;Unknown		
9/17/18 15:00	9/17/18 16:23	82 min		Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown		
9/12/18 17:01	9/12/18 17:38	37 min		Unknown;Unknown;Unknown;Bethany		
9/10/18 15:00	9/10/18 16:21	81 min		Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown		
9/5/18 14:59	9/5/18 16:19	79 min		Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown		
9/4/18 14:57	9/4/18 15:06	9 min		Bethany;Unknown;Unknown;Unknown;Unknown		
8/30/18 16:00	8/30/18 18:20	19 min	RomCon	Unknown;Bethany		
8/27/18 15:00	8/27/18 16:48	107 min		Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		



8/21/18 14:00	8/21/18 14:11	10 min	RomCon	Kristin; Bethany		
8/20/18 17:59	8/20/18 18:37	38 min	2Kristen - RomCo	Kristin; Bethany		
8/20/18 16:59	8/20/18 17:50	50 min		Bethany; Addison		
8/20/18 14:58	8/20/18 16:24	85 min		Unknown; Bethany; Unknown; Unknown; Unknown; Unknown; Unknown; Unknown; Unknown; Unknown; Unknown		
8/14/18 15:00	8/14/18 16:11	71 min		Unknown; Unknown; Unknown; Unknown; Bethany		
8/13/18 17:45	8/13/18 18:19	34 min	Facebook with Ac	Bethany; Addison		
8/10/18 15:00	8/10/18 16:10	69 min	Addison	Bethany; Addison		
8/6/18 14:59	8/6/18 16:35	96 min		Bethany; Unknown; Unknown; Unknown; Unknown; Unknown; Unknown; Unknown; Unknown		
8/1/18 15:00	8/1/18 16:51	51 min	RomCon	Unknown; Unknown; Bethany; Unknown; Unknown		
7/30/18 14:59	7/30/18 16:15	76 min		Unknown; Unknown; Unknown; Unknown; Unknown; Unknown; Bethany; Unknown		
7/16/18 17:59	7/16/18 18:34	36 min	Witness Protectio	Unknown; Cathalen; Bethany; Wireless		
7/15/18 14:58	7/16/18 16:28	90 min		Wireless; Unknown; Cathalen; Nicholas; Bethany; Wireless; Wireless; Wireless; Wireless		
7/12/18 13:58	7/12/18 14:47	48 min		Horton; Unknown; Bethany		
7/11/18 15:01	7/11/18 16:47	46 min		Bethany; Colin; Private		
7/11/18 14:15	7/11/18 14:57	42 min		Unknown; Bethany; Cathalen		
7/9/18 14:59	7/9/18 16:41	101 min		Unknown; Wireless; Nicholas; Wireless; Cathalen; Bethany		
7/5/18 15:00	7/5/18 15:08	8 min		Cathalen; Kindick; Kindick		
7/2/18 14:59	7/2/18 17:44	165 min		Wireless; Wireless; Cathalen; Nicholas; Unknown; Bethany; Wireless		
6/27/18 12:59	6/27/18 13:41	42 min		Bethany; Unknown; Cathalen; Wireless		
6/25/18 16:14	6/25/18 16:57	42 min	Barb Carey	Wireless; Bethany; Cathalen; Unknown		
6/25/18 15:00	6/26/18 15:58	58 min		Cathalen; Unknown; Wireless; Wireless; Nicholas; Unknown; Bethany		
6/18/18 15:00	6/18/18 16:36	96 min		Bethany; Wireless; Unknown; Cathalen; Unknown; Wireless; Nicholas; Wireless; Cathalen		
6/14/18 17:29	6/14/18 18:08	39 min	Masters of the Co	Bethany; Unknown; Cathalen; Wireless		
6/13/18 15:00	6/13/18 15:26	25 min		Cathalen; Wireless; Bethany; Wireless		
6/11/18 15:00	6/11/18 16:09	68 min		Unknown; Unknown; Wireless; Bethany; Cathalen; Wireless; Nicholas; Kindick; Wireless		
6/6/18 15:15	6/6/18 16:08	52 min		Kindick; Cathalen; Bethany; Wireless; Unknown		
6/6/18 15:00	6/6/18 15:01	1 min		Bethany; Cathalen		
6/4/18 15:00	6/4/18 15:11	10 min		Cathalen; Kindick		



5/30/18 15:56	5/30/18 17:28	89 min	RomCon	Bethany;Robert;Cathalen;Wireless;Wireless		
5/29/18 14:59	5/29/18 16:48	108 min		Robert;Bethany;Nicholas;Cathalen;Wireless;Wireless;Wireless;Bethany		
5/21/18 13:57	5/21/18 16:23	145 min	Addison - Zoey	Bethany;Sarah;Soto;Robert;Nicholas;Cathalen;Wireless		
5/9/18 19:26	5/9/18 20:08	39 min		Unknown;Wireless;Cathalen;Bethany;Nicholas		
5/7/18 15:00	5/7/18 16:47	106 min		Cathalen;Bethany;Unknown;Wireless;Nicholas;Wireless;Wireless;Unknown;Wireless		
5/2/18 14:29	5/2/18 16:31	121 min		Bethany;Unknown;Cathalen;Wireless;Wireless;Nicholas;Sharon		
4/30/18 22:16	4/30/18 23:34	77 min		Unknown;Wireless;Wills		
4/24/18 14:59	4/24/18 16:04	64 min		Sharon;Unknown;Nicholas;Bethany;Cathalen;Wireless;Unknown;Wireless;Unknown;Unknown;Wireless;Wireless;Wireless		
4/23/18 15:00	4/23/18 15:06	4 min		Wireless;Wireless		
4/16/18 15:00	4/16/18 16:23	23 min		Sharon;Cathalen;Nicholas;Unknown;Wireless;Bethany;Wireless;Wireless;Unknown		
4/12/18 14:00	4/12/18 14:55	64 min		Cathalen;Bethany;Wireless;Wireless;Halle		
4/9/18 15:00	4/9/18 16:57	117 min		Unknown;Cathalen;Sharon;Unknown;Nicholas;Bethany;Wireless;Wireless;Nicholas;Wireless		
4/3/18 15:00	4/3/18 17:09	128 min		Cathalen;Unknown;Sharon;Wireless;Bethany;Wireless;Cathalen;Cathalen		
3/28/18 13:59	3/28/18 14:47	48 min		Unknown;Bethany;Wireless		
3/26/18 15:01	3/26/18 16:59	58 min		Unknown;Cathalen;Bethany;Wireless;Nicholas;Wireless;Wills;Unknown;Wireless;Wireless;Wireless;Wireless;Wireless		
3/20/18 17:01	3/20/18 17:35	34 min		Cathalen;Bethany;Unknown;Unknown		
3/19/18 14:59	3/19/18 16:53	113 min		Unknown;Wireless;Bethany;Cathalen;Nicholas;Sharon;Wireless;Unknown;Unknown		
3/12/18 15:00	3/12/18 20:00	300 min		Cathalen;Wireless;Nicholas;Unknown;Wireless;Wireless;Sharon;Unknown;Wireless;Wireless;Wills		
3/6/18 16:59	3/6/18 17:41	41 min	Legal	Sharon;Elizabeth;Law		
3/5/18 15:56	3/5/18 16:38	40 min		Bethany;Cathalen;Nicholas;Unknown;Wireless;Sharon;Wireless;Unknown		
2/28/18 17:59	2/28/18 18:30	30 min		Cathalen;Bethany;Unknown		
2/21/18 15:55	2/21/18 16:45	49 min	Conference	Halle;Unknown;Cathalen;Bethany;Wireless;Wireless;Unknown;Wireless		
2/19/18 16:00	2/19/18 18:14	134 min		Cathalen;Unknown;Nicholas;Bethany;Wireless;Sharon;Wireless;Wireless;Unknown;Wireless		
2/19/18 15:00	2/19/18 15:41	41 min		Law;Bethany;Elizabeth		
2/14/18 15:59	2/14/18 16:39	40 min		Wireless;Bethany;Cathalen;Unknown		
2/12/18 16:00	2/12/18 16:51	51 min		Cathalen;Unknown;Nicholas;Wireless;Sharon;Bethany;Unknown;Wireless;Wireless		
2/9/18 16:17	2/9/18 16:45	28 min		Bethany;Cathalen;Unknown		
2/8/18 14:30	2/8/18 15:12	41 min		Cathalen;Bethany;Wireless		

2/6/18 16:12	2/6/18 17:15	62 min		Brooks; Bethany; Law	
2/5/18 15:59	2/6/18 18:56	176 min		Wireless; Nicholas; Wireless; Unknown; Cathalen; Unknown; Wireless; Bethany; Wireless	
2/1/18 15:59	2/1/18 17:38	97 min	Anya Summers c	Unknown; Cathalen; Bethany; Wireless	
1/31/18 20:00	1/31/18 20:27	26 min	Legal	Law; Bethany; Elizabeth	
1/31/18 19:00	1/31/18 19:30	30 min	Server Migration	Cathalen; Bethany; Webair; Unknown	
1/29/18 15:43	1/29/18 17:47	123 min		Cathalen; Unknown; Bethany; Kindick; Nicholas; Wireless; Unknown; Unknown; Wireless; Wireless; Unknown	
1/23/18 16:02	1/23/18 16:34	31 min		Bethany; Unknown; Wireless	
1/22/18 15:57	1/22/18 18:15	137 min		Unknown; Unknown; Kindick; Bethany; Wireless; Wireless; Wireless	
1/17/18 15:55	1/17/18 18:35	160 min		Nicholas; Halle; Nicholas; Wireless; Kindick; Unknown; Wireless; Wireless; Bethany; Unknown; Unknown; U	<a href="http://www.uberco">http://www.uberco</a>
1/17/18 15:46	1/17/18 15:54	8 min		Bethany; Nicholas; Unknown; Halle	
1/15/18 16:59	1/15/18 18:06	66 min		Unknown; Cathalen; Bethany	
1/10/18 15:58	1/10/18 18:30	161 min		Wireless; Wireless; Unknown; Bethany; Nicholas; Kindick; Cathalen; Unknown; Wireless; Wireless; Wireless; Wireless	
1/10/18 14:31	1/10/18 14:59	27 min		Unknown; Bethany; Cathalen; Univ	
1/8/18 17:59	1/8/18 19:13	73 min		Unknown; Cathalen; Bethany	
1/6/18 15:56	1/6/18 16:51	54 min		Cathalen; Tammy; Bethany	
1/4/18 22:59	1/6/18 1:57	178 min		Wireless; Unknown; Wireless	
1/3/18 18:30	1/3/18 19:27	57 min		Unknown; Bethany; Cathalen; Wireless; Wireless	
1/3/18 15:59	1/3/18 18:04	125 min		Unknown; Nicholas; Wireless; Cathalen; Bethany; Wireless; Unknown; Wireless; Wireless; Buchan; Wireless; Buchan; Unknown	
1/2/18 18:01	1/2/18 19:57	116 min		Bethany; Unknown; Cathalen	
12/21/17 16:30	12/21/17 17:53	83 min		Nicholas; Kindick; Buchan; Nicholas; Unknown; Bethany; Cathalen; Wireless; Wireless	
12/13/17 16:00	12/13/17 17:42	101 min		Cathalen; Kindick; Unknown; Bethany; Buchan; Wireless; Buchan; Wireless; Nicholas; Wireless	
12/7/17 16:21	12/7/17 17:03	42 min		Cathalen; Buchan; Bethany	
12/7/17 16:00	12/7/17 16:12	11 min		Buchan; Cathalen	
12/6/17 16:59	12/6/17 18:50	110 min		Wireless; Nicholas; Wireless; Buchan; Unknown; Bethany; Bethany; Cathalen; Wireless; Wireless; Nicholas; Wireless	
12/4/17 17:30	12/4/17 17:40	10 min		Cathalen; Bethany	
12/4/17 16:00	12/4/17 17:11	71 min		Bethany; Law; Bethany	
11/29/17 19:14	11/29/17 19:28	8 min		Wireless; Bethany	
11/29/17 15:56	11/29/17 17:57	120 min		Bethany; Cathalen; Unknown; Buchan; Kindick; Wireless; Bethany; Nicholas; Wireless; Wireless	

11/21/17 15:56	11/21/17 17:12	76 min		Wireless; Cathalen; Kindick; Unknown; Buchan; Bethany; Nicholas		
11/15/17 15:58	11/15/17 18:14	136 min		Wireless; Kindick; Unknown; Buchan; Cathalen; Bethany; Wireless; Nicholas; Wireless; Wireless		
11/9/17 15:28	11/9/17 16:52	83 min		Halle; Bethany; Clay; Clay; Clay; Bethany		<a href="https://">https://</a>
11/8/17 16:00	11/8/17 17:53	113 min		Unknown; Cathalen; Bethany; Wireless; Buchan; Kindick; Wireless; Nicholas; Wireless; Wireless; Wireless		
11/7/17 15:59	11/7/17 17:11	72 min		Bethany; Unknown; Cathalen; Buchan; Wireless; Wireless		
11/1/17 14:59	11/1/17 17:21	141 min		Unknown; Bethany; Cathalen; Kindick; Buchan; Wireless; Nicholas; Wireless; Wireless; Wireless		
10/25/17 15:29	10/25/17 17:14	104 min		Wireless; Unknown; Cathalen; Buchan; Bethany; Wireless; Wireless; Nicholas; Wireless		
10/23/17 15:01	10/23/17 16:01	60 min		Unknown; Buchan; Bethany		
10/18/17 15:00	10/18/17 17:20	139 min		Unknown; Cathalen; Wireless; Bethany; Unknown; Buchan; Wireless; Nicholas; Wireless; Wireless		
10/16/17 15:00	10/16/17 16:58	118 min		Buchan; Bethany; Unknown		
10/13/17 16:59	10/13/17 18:10	70 min		Unknown; Unknown; Bethany		
10/12/17 18:30	10/12/17 19:18	47 min		Bethany; Cathalen		
10/11/17 15:59	10/11/17 18:48	49 min		Wireless; Nicholas; Unknown; Buchan; Wireless; Cathalen; Bethany; Bethany; Wireless		
10/11/17 15:00	10/11/17 16:44	44 min		Wireless; Wireless; Cathalen; Unknown; Buchan; Bethany		
10/4/17 14:30	10/4/17 17:08	166 min		Wireless; Unknown; Wireless; Buchan; Bethany; Cathalen; Nicholas; Wireless; Wireless		
10/3/17 15:44	10/3/17 16:51	67 min	rom con	Halle; Bethany; Cathalen; Unknown		
9/28/17 16:59	9/28/17 17:22	23 min		Bethany; Unknown; Steve		
9/27/17 18:29	9/27/17 18:50	21 min		Soto; Cathalen; Wireless; Bethany		
9/27/17 15:59	9/27/17 16:07	8 min		Wireless; Kindick; Buchan; Cathalen; Nicholas; Wireless		
9/25/17 17:59	9/25/17 18:07	67 min	Romcon	Halle; Cathalen; Bethany		
9/22/17 16:30	9/22/17 17:29	58 min		Wireless; Bethany; Unknown		
9/21/17 15:58	9/21/17 16:39	40 min	Addison - Stolen	Bethany; Soto; Cathalen; Wireless		
9/20/17 17:49	9/20/17 19:09	79 min	Anya	Bethany; Cathalen; Unknown; Wireless; Wireless		
9/20/17 14:59	9/20/17 16:36	97 min		Unknown; Bethany; Cathalen; Buchan; Kindick; Wireless; Nicholas; Wireless; Nicholas		
9/18/17 17:28	9/18/17 18:11	43 min		Unknown; Unknown; Bethany		
9/15/17 15:29	9/15/17 16:45	76 min	Joannie	Kindick; Wireless; Bethany		
9/13/17 15:01	9/13/17 16:59	118 min		Wireless; Bethany; Cathalen; Buchan; Unknown; Kindick; Unknown; Nicholas; Wireless; Buchan		
9/6/17 14:58	9/6/17 16:39	101 min		Bethany; patty; Wireless; Unknown; Cathalen; Unknown; Buchan; Wireless; Nicholas; Wireless; Wireless; Wireless		

9/6/17 14:15	9/6/17 14:50	34 min		Bethany;Buchan;Wireless	
9/5/17 16:56	9/5/17 17:56	57 min	Dark and Seducti	Cathalen;Bethany;Soto;Wireless	
8/25/17 17:56	8/25/17 18:24	28 min		Wireless;Bethany;Steve	
8/23/17 14:59	8/23/17 17:27	147 min		Unknown;Unknown;Unknown;Buchan;Cathalen;Bethany;Nicholas;Wireless;Wireless	
8/16/17 14:58	8/16/17 17:53	174 min		Bethany;Unknown;Unknown;Ruth;Wireless;Wireless;Buchan;Cathalen;Wireless;Cathalen;Nicholas;Wireless;Wireless	
8/9/17 15:00	8/9/17 17:09	128 min		Bethany;Unknown;Cathalen;Buchan;Unknown;Unknown;Wireless;Wireless;Nicholas;Wireless	
8/2/17 14:56	8/2/17 17:05	128 min		Bethany;Unknown;Kindick;Silver;Buchan;Wireless;Unknown;Nicholas;Wireless;Wireless	<a href="http://www.ubercor">http://www.ubercor</a>
7/31/17 18:46	7/31/17 19:38	52 min		Bethany;Bethany;Wireless;Crossland;Steve	
7/25/17 14:59	7/25/17 15:37	37 min		Bethany;Cathalen;Soto	
7/24/17 15:58	7/24/17 16:54	55 min		Unknown;Nicholas;Wireless;Unknown;Cathalen;Buchan;Bethany;Buchan;Unknown;Wireless	
7/24/17 15:00	7/24/17 15:46	44 min		Unknown;Buchan;Bethany;Unknown;Cathalen;Wireless	
7/19/17 14:59	7/19/17 16:41	101 min		Wireless;Unknown;Cathalen;Unknown;Wireless;Buchan;Bethany;Buchan;Wireless;Nicholas	<a href="http://www.ubercor">http://www.ubercor</a>
7/13/17 17:19	7/13/17 18:00	41 min		Wireless;Wireless	
7/13/17 14:59	7/13/17 16:38	98 min		Unknown;Cathalen;Kindick;Buchan;Wireless;Unknown;Wireless;Wireless;Nicholas;Wireless	
7/12/17 15:00	7/12/17 15:09	8 min		Kindick;Buchan;Unknown	
7/10/17 16:58	7/10/17 17:50	52 min		Bethany;Berman;Wireless	
7/5/17 15:29	7/5/17 17:43	133 min		Buchan;Cathalen;Unknown;Bethany;Wireless;Unknown;Unknown;Nicholas;Wireless;Wireless;Buchan;Wireless;Wireless	
7/1/17 14:00	7/1/17 15:19	79 min		Cathalen;Wireless;Unknown;Bethany;Tammy	
6/28/17 16:00	6/28/17 17:11	71 min		Wireless;Unknown;Cathalen;Bethany;Wireless;Kindick;Unknown;Nicholas;Buchan;Wireless;Wireless;Wireless	
6/28/17 15:00	6/28/17 16:44	43 min		Unknown;Bethany;Unknown;Kindick;Wireless;Cathalen;Buchan;Wireless;Kindick	
6/21/17 14:59	6/21/17 16:45	106 min		Unknown;Cathalen;Unknown;Buchan;Bethany;Wireless;Unknown;Wireless;Nicholas;Wireless;Wireless;Bethany;Wireless;	
6/20/17 21:11	6/20/17 21:52	41 min		Wireless;Unknown;Tammy	
6/12/17 18:55	6/12/17 19:39	43 min		Cathalen;Wireless;Buchan;Bethany	
6/12/17 15:59	6/12/17 16:55	55 min		Wireless;Cathalen;Unknown;Wireless;Nicholas;Bethany;Buchan;Unknown;Kindick;Buchan	
6/7/17 15:00	6/7/17 16:36	95 min		Kindick;Unknown;Cathalen;Bethany;Unknown;Wireless;Buchan;Nicholas;Wireless;Wireless	
6/5/17 19:14	6/5/17 20:07	53 min	Hero Undercover	Unknown;Cathalen;Bethany;Wireless;Renee;Maggie;Mcivor	<a href="https">https</a>
5/31/17 15:00	5/31/17 17:30	149 min		Cathalen;Wireless;Unknown;Wireless;Bethany;Unknown;Buchan;Nicholas;Wireless;Wireless;Bethany	
5/30/17 20:58	5/30/17 21:26	28 min	Boston Dome Mai	Cathalen;Bethany;Zelaya;Collins	

5/24/17 14:59	5/24/17 17:31	161 min		Cathalen;Unknown;Wireless;Unknown;Wireless;Bethany;Cathalen;Unknown;Buchan;Wireless;Wireless;http://www.ubercor
5/22/17 18:58	5/22/17 20:09	71 min	Hero Undercover	Cathalen;Maggie;patty;Wireless;Bethany;Tammy
5/17/17 15:00	5/17/17 17:55	174 min		Bethany;Wireless;Robert;Cathalen;Sharon;Unknown
4/26/17 14:47	4/26/17 17:36	168 min		Buchan;Bethany;Bethany;Wireless;Wireless;Sharon;Unknown;Wireless;Nicholas;Wireless
4/19/17 14:52	4/19/17 17:00	127 min		Sharon;Unknown;Wireless;Cathalen;Wireless;Bethany;Wireless;Bethany;Unknown;Nicholas;Buchan;http://www.ubercor
4/13/17 18:25	4/13/17 18:49	24 min		Buchan;Webair;Bethany
4/6/17 14:58	4/6/17 17:14	135 min		Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Wireless;Buchan
3/29/17 14:57	3/29/17 17:40	163 min		Wireless;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Buchan;Unknown;Unknown;Unknown;Bethany;Unknown;Unl
3/27/17 20:31	3/27/17 21:21	49 min		Buchan;Unknown
3/23/17 15:01	3/23/17 16:33	92 min		Unknown;Bethany;Unknown
3/22/17 15:00	3/22/17 17:41	161 min		Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Wireless;Unknown;Unknown;Unknown
3/21/17 17:00	3/21/17 17:19	18 min		Unknown;Brown
3/6/17 15:58	3/6/17 16:51	53 min	Meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany
3/1/17 21:06	3/1/17 21:38	30 min		Unknown;Unknown;Bethany
3/1/17 17:45	3/1/17 19:07	82 min		Bethany;Unknown;Bethany;Bethany
3/1/17 16:00	3/1/17 17:21	81 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown
2/24/17 15:04	2/24/17 16:10	5 min		Unknown;Bethany
2/22/17 21:01	2/22/17 21:38	36 min		Bethany;Bethany;Unknown
2/22/17 15:58	2/22/17 17:21	82 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Eslynn;Unknown;Unknown;Unknown;Unknown
2/21/17 16:00	2/21/17 16:51	50 min		Unknown;Bethany;Webair
2/15/17 17:13	2/15/17 18:23	69 min		Unknown;Unknown;Bethany
2/15/17 15:59	2/15/17 17:13	73 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown
2/13/17 17:00	2/13/17 18:24	84 min		Unknown;Bethany;Unknown
2/8/17 15:58	2/8/17 17:56	117 min		Unknown;Unknown;Unknown;Unknown;Unknown;Eslynn;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown
2/2/17 16:00	2/2/17 17:41	100 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown
1/25/17 15:57	1/25/17 18:47	170 min	Weekly meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Eslynn;Unknown;Unknown;Unknown
1/18/17 14:57	1/18/17 16:48	110 min	Weekly Meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown
1/17/17 14:58	1/17/17 16:31	32 min		Bethany;Hannah;Unknown

1/16/17 19:45	1/18/17 20:23	37 min		Bethany;Unknown;Hannah		
1/13/17 14:23	1/13/17 14:58	35 min	Blushing Deals	Bethany;Hannah;Unknown;Bethany		
1/12/17 16:02	1/12/17 17:54	111 min	Weekly Meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown		
1/12/17 16:00	1/12/17 16:02	2 min	Weekly Meeting	Unknown;patty		
1/4/17 15:59	1/4/17 17:44	105 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown		
12/29/16 15:52	12/29/16 17:55	117 min		Unknown;Unknown;Wireless;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
12/21/16 15:59	12/21/16 17:10	71 min		Wireless;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown		
12/14/16 15:59	12/14/16 17:33	94 min		Unknown;Unknown;Unknown;Unknown;Wireless;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown		
12/7/16 16:00	12/7/16 18:17	137 min		Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
12/2/16 19:00	12/2/16 19:19	19 min		Unknown;Unknown;Unknown;Bethany;Unknown;Unknown		
12/2/16 18:15	12/2/16 18:49	33 min		Unknown;Unknown;Bethany		
11/30/16 15:59	11/30/16 18:22	142 min		Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Esiynne;Unknown		
11/22/16 15:57	11/22/16 16:56	59 min	Production/Release	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown		
11/16/16 15:59	11/16/16 18:12	132 min	Combined Meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown		
11/10/16 15:59	11/10/16 17:20	80 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany		
11/9/16 15:59	11/9/16 18:25	145 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown		
11/2/16 14:57	11/2/16 16:30	92 min		Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
10/31/16 17:00	10/31/16 17:35	35 min		Unknown;Bethany;Esiynne		
10/27/16 17:00	10/27/16 18:16	76 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown		
10/26/16 16:56	10/26/16 18:16	78 min	Production meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown		
10/20/16 16:59	10/20/16 18:21	81 min		Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
10/19/16 16:58	10/19/16 18:16	78 min	Production Meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
10/13/16 16:56	10/13/16 17:55	63 min	Release meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown		
10/12/16 16:58	10/12/16 18:22	84 min	Production Meeting	Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
10/5/16 14:07	10/5/16 16:34	147 min		Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;eslynn;patty;Unknown;Unknown;Unknown;Unknown		
10/4/16 14:57	10/4/16 15:38	41 min		Unknown;Unknown;Unknown;Unknown		
9/28/16 16:59	9/28/16 18:33	93 min	Combined weekly	Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;patty;Unknown;patty		
9/22/16 17:00	9/22/16 18:54	114 min	Combined meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown		



9/21/16 17:01	9/21/16 17:04	3 min		Ealynne;Unknown		
9/20/16 16:56	9/20/16 18:22	84 min		Ealynne;Bethany;Unknown		
9/15/16 16:59	9/15/16 18:20	80 min	Release meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Ealynne;Unknown		
9/8/16 16:59	9/8/16 18:36	97 min	Release meeting	Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
9/7/16 16:59	9/7/16 19:07	128 min	Production Meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown		
9/1/16 16:59	9/1/16 18:39	100 min	meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown		
8/25/16 17:00	8/25/16 18:29	89 min		Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
8/24/16 16:57	8/24/16 18:52	115 min		Unknown;Unknown;Unknown;Unknown;Unknown;Ealynne;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
8/18/16 20:00	8/18/16 20:55	54 min		Unknown;Bethany;Ealynne		
8/18/16 16:58	8/18/16 18:08	69 min	Release Meeting	Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
8/17/16 16:59	8/17/16 18:26	86 min	Production Meeting	Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Ealynne		
8/15/16 16:59	8/15/16 20:35	95 min		Bethany;Unknown;Unknown;Ealynne;Unknown		
8/10/16 16:58	8/10/16 18:45	106 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown	<a href="http://www.ubercor">http://www.ubercor</a>	
8/3/16 16:57	8/3/16 19:00	123 min	Publication and R	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown		
7/28/16 16:59	7/28/16 18:24	84 min		Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown		
7/27/16 16:59	7/27/16 18:54	115 min		Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown		
7/21/16 16:55	7/21/16 18:11	78 min		Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown		
7/20/16 16:58	7/20/16 18:44	106 min	Production Meeting	Ealynne;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown		
7/14/16 17:00	7/14/16 18:16	75 min	Release meeting	Unknown;Unknown;Bethany;Unknown;Unknown		
7/13/16 16:57	7/13/16 18:47	109 min	Production	Unknown;Unknown;Unknown;Unknown;Ealynne;Bethany;Unknown;Unknown;Unknown;Unknown		
7/12/16 14:58	7/12/16 15:53	55 min		Unknown;Unknown;Unknown;Unknown;Bethany		
7/11/16 15:00	7/11/16 15:29	29 min	Blushing Books' s	Unknown;Bethany;Unknown;Unknown;Unknown		
7/7/16 15:00	7/7/16 15:47	46 min		Unknown;Unknown;Unknown;Unknown;Bethany;Unknown		
7/6/16 16:55	7/6/16 18:31	96 min		Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Ealynne;Unknown		
7/1/16 13:57	7/1/16 14:40	43 min	Military Box Set U	Unknown;Bethany;Unknown;Unknown;Unknown;Renee;Unknown;Bethany		
6/29/16 14:59	6/29/16 16:49	110 min		Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Bethany;Unknown;Unknown		
6/23/16 20:00	6/23/16 20:27	27 min		Bethany;Unknown;Unknown		
6/23/16 16:58	6/23/16 18:09	70 min		Unknown;Unknown;Bethany;Unknown;Unknown;Unknown		

6/22/16 17:00	6/22/16 18:20	80 min	Production	Unknown;Unknown;Unknown;Bethany;Unknown;Ealynne;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown	
6/16/16 16:50	6/16/16 18:33	103 min		Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Ealynne;Unknown	
6/14/16 16:41	6/14/16 19:16	34 min		Bethany;patty;Unknown;Unknown;Unknown	
6/9/16 16:58	6/9/16 18:16	78 min	Release meeting	Unknown;Unknown;Bethany;Unknown;Unknown;patty;Unknown;Unknown	
6/8/16 16:44	6/8/16 19:11	147 min	Bethany's	Unknown;Ealynne;Unknown;Unknown;Bethany;patty;Unknown;Unknown;Unknown	
6/2/16 16:57	6/2/16 18:33	96 min	Release meeting	Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;patty	<a href="https://www.uber.com">https://www.uber.com</a>
6/1/16 16:45	6/1/16 18:11	86 min	Bethany's	Unknown;Unknown;Ealynne;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown	
5/26/16 16:57	5/26/16 18:23	86 min	Release meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany	<a href="http://www.uber.com">http://www.uber.com</a>
5/25/16 16:43	5/25/16 18:41	117 min	Bethany's	Unknown;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown	
5/24/16 21:15	5/24/16 21:49	34 min		Unknown;Unknown;Unknown;Bethany	
5/19/16 16:58	5/19/16 17:52	54 min	Release meeting	Unknown;Unknown;Unknown;patty;Unknown;Bethany;Unknown	
5/18/16 15:13	5/18/16 17:02	108 min		Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Ealynne;Unknown	
5/5/16 15:28	5/5/16 16:58	90 min	Marketing Meeting	Unknown;Unknown;Bethany;Unknown;patty;Unknown;Unknown	
5/4/16 15:14	5/4/16 17:27	133 min	Bethany's	Ealynne;Unknown;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown	<a href="http://www.uber.com">http://www.uber.com</a>
4/28/16 15:26	4/28/16 16:41	72 min	Release meeting	Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Bethany	
4/27/16 15:14	4/27/16 17:04	110 min	Bethany's Meeting	Unknown;Unknown;Unknown;Bethany;Ealynne;Unknown;Unknown;patty;Unknown;Unknown	
4/21/16 14:58	4/21/16 17:21	143 min	Production and M	Unknown;Unknown;Unknown;Unknown;Unknown;Ealynne;Unknown;Bethany;Bethany	<a href="http://www.uber.com">http://www.uber.com</a>
4/20/16 15:42	4/20/16 15:59	17 min		Bethany;Unknown	
4/20/16 15:30	4/20/16 15:40	9 min		Unknown;Unknown	
4/20/16 15:16	4/20/16 15:25	8 min		Unknown;Unknown;Unknown;Unknown	
4/7/16 15:58	4/7/16 17:11	72 min	Release meeting	Patty;Unknown;Unknown;Unknown;Patty;Unknown;Unknown;Unknown;Bethany	<a href="http://www.uber.com">http://www.uber.com</a>
4/6/16 16:29	4/6/16 18:50	141 min	Store	Ealynne;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown	
4/6/16 15:29	4/6/16 15:40	11 min		Unknown;Unknown;Unknown	<a href="http://www.uber.com">http://www.uber.com</a>
4/6/16 15:15	4/6/16 15:28	13 min		Unknown;Unknown;Unknown;Unknown	<a href="http://www.uber.com">http://www.uber.com</a>
3/31/16 13:01	3/31/16 14:00	58 min		Unknown;Unknown;Unknown	
3/29/16 18:52	3/29/16 19:33	40 min		Bethany;Unknown;Unknown	
3/29/16 14:29	3/29/16 17:35	186 min	Store Meeting	Ealynne;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown	
3/24/16 14:34	3/24/16 16:05	90 min		Ealynne;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown	



3/23/16 14:39	3/23/16 16:52	132 min		Unknown;Unknown;Ealyne;Bethany;Unknown;Unknown;Unknown;Unknown	
3/17/16 15:58	3/17/16 16:32	33 min	Woodshed	Ealyne;Unknown;Unknown;Bethany;Unknown;Unknown	
3/17/16 14:58	3/17/16 15:54	55 min	Sales Meeting	Bethany;Unknown;Unknown;Unknown;Unknown	
3/16/16 15:15	3/16/16 18:52	98 min		Ealyne;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown	
3/10/16 15:44	3/10/16 18:58	89 min		Ealyne;Bethany;Unknown;Unknown;Unknown;Unknown	
3/8/16 15:29	3/8/16 17:12	103 min		Ealyne;Bethany;Unknown;Unknown;Unknown;Unknown	
3/7/16 15:57	3/7/16 16:26	28 min		Bethany;Unknown;Unknown	
3/3/16 15:46	3/3/16 17:00	73 min		Ealyne;Bethany;Unknown;Unknown;Unknown;Unknown	
3/2/16 15:31	3/2/16 16:11	40 min		Bethany;Ealyne;Unknown	
3/2/16 3:04	3/2/16 3:11	6 min		Bethany;Unknown	
3/1/16 15:30	3/1/16 17:08	98 min		Unknown;Unknown;Ealyne;Bethany;Unknown;Unknown;Unknown;Unknown	
2/26/16 0:26	2/26/16 1:50	83 min	Audio Book Prodi	Anna;Anne (HBI);Unknown;Bethany	<a href="http://www.ubercor">http://www.ubercor</a>
2/25/16 17:59	2/25/16 19:09	63 min		Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Lawson	
2/25/16 15:44	2/25/16 16:05	21 min		Unknown;Unknown;Unknown;Unknown;Lawson;Unknown;Unknown	
2/24/16 1:24	2/24/16 2:23	58 min		Bethany;Ealyne;Unknown	
2/23/16 15:27	2/23/16 16:57	90 min	Woodshed	Ealyne;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Lawson	
2/18/16 15:59	2/18/16 17:20	80 min		Unknown;Unknown;Unknown;Unknown;Unknown;Lawson;Bethany;Unknown;Unknown	
2/17/16 15:49	2/17/16 16:44	54 min		Unknown;Bethany;Unknown	
2/16/16 15:12	2/16/16 17:45	152 min		Unknown;Bethany;Ealyne;Unknown;Unknown;Unknown;Unknown;Unknown;Unknown;Lawson;Unknown;Unknown	
2/12/16 19:57	2/12/16 21:08	71 min		Unknown;Ealyne;Unknown;Lawson;Bethany;Unknown;Unknown;Unknown	
2/9/16 15:15	2/9/16 17:06	113 min		Unknown;Bethany;Unknown;Unknown;Lawson;Unknown;Unknown	
2/4/16 20:29	2/4/16 20:55	26 min		Unknown;Unknown;Unknown;Unknown;Bethany	
2/4/16 17:59	2/4/16 18:09	10 min		Unknown;804-839-1462;Unknown	
2/4/16 15:59	2/4/16 17:50	110 min	Release mtg	Bethany;Unknown;Unknown;Unknown;Unknown	
2/2/16 15:33	2/2/16 17:45	132 min	Woodshed mtg.	Ealyne;Unknown;Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Lawson	
1/28/16 17:45	1/28/16 19:08	82 min	Release Mtg.	Unknown;Bethany;Unknown;Unknown;Unknown;Unknown;Unknown	
1/26/16 15:29	1/26/16 17:44	134 min		Unknown;Ealyne;Unknown;Bethany;Unknown;Unknown;Unknown;Lawson;Unknown	
1/21/16 17:59	1/21/16 19:09	70 min		Unknown;Unknown;Unknown;Lawson;Unknown;Unknown;Unknown;Bethany	

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**ABCD Graphics and Design Inc****Ordinary Income/Expense****Income**

BH Publishing		74,168.24
Blushing Publishing		
Audio Income	2,512.00	
Blushing Books	857,470.64	
Kobo	17,089.92	
Radish	11,610.64	
Total Blushing Publishing		888,683.20
Blushing Websites		
Bethany/Romance	875.80	
Total Blushing Websites		875.80
CF Publications		485,746.40
<b>Total Income</b>		<b>1,449,473.64</b>

**Cost of Goods Sold**


Audiobook Production		3,600.00
Author Payments		
Advances	85,952.04	
Publisher Partner	3,823.36	
Royalties - Quarterly Payments	560,887.60	
Total Author Payments		650,663.00
Book Printing		125.08
Content Formatting/Design/Mgmt.		20,799.84
Editing		46,200.00
Merchant Account Fees		
Chargeback Fee	399.60	
fees paypal	491.88	
Humboldt	3,077.56	
Moneris	1,013.60	
Netbilling	2,344.32	
Merchant Account Fees - Other	120.00	
Total Merchant Account Fees		7,446.96
Stock Images and Fonts		894.36
Website Content		
Work For Hire Content	43,600.00	
Total Website Content		43,600.00
Website Management Fees		
BB Blog	17,333.20	
HerWoodshed	9,008.56	
Total Website Management Fees		26,341.76
<b>Total COGS</b>		<b>799,671.00</b>
<b>Gross Profit</b>		<b>649,802.64</b>

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**Expense**


Accounting Professional Fees	6,652.00
Advertising and Promotion	
Mailing List	1,600.00
Marketing	749.72
Advertising and Promotion - Other	5,179.96
Total Advertising and Promotion	7,529.68
Automobile Expense	118.00
Bank Service Charges	
Adjustment	-1.20
International Fees	25.80
Monthly fee	180.00
Wire Transfer Fee	660.00
Total Bank Service Charges	864.60
Conference	
Conference - RT - registration	3,720.00
Total Conference	3,720.00
Conference - Blushing at RT	3,660.00
Conference - RomCon	
RomCon Management	6,500.00
Conference - RomCon - Other	1,300.00
Total Conference - RomCon	7,800.00
Contractors	184,994.80
Customer Service	14,400.00
Donation	484.00
Dues and Subscriptions	200.00
Educational Expenses	1,165.96
Gifts	566.28
Hosting	
Google Mail Fee	440.00
Servers	2,768.12
Total Hosting	3,208.12
Insurance Medical	5,304.00
Internet Access	3,314.36
Marketing Consultant	34,666.52
Meals and Entertainment	2,721.24
Misc Exp	259.36
Office Expense	6,504.48
Office Supplies	1,614.96
Payroll - Officer	36,000.00
Payroll - Regular	115,320.08
Payroll - Taxes - Federal	45,960.80
Payroll - Taxes - State - VA	212.52
Payroll Fees	3,536.00
Postage and Delivery	179.28
Production Management	34,666.56
Professional Fees	
Consult Fee	7,600.00
Legal Fees	27,993.68

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**ABCD Graphics and Design, Inc.**

**General**

SCC ID: 07418064  
 Entity Type: Corporation  
 Jurisdiction of Formation: VA  
 Date of Formation/Registration: 9/19/2011  
 Status: Active  
 Shares Authorized: 100

**Principal Office**

977 SEMINOLE TRAIL #233  
 CHARLOTTESVILLE VA 22903

**Registered Agent/Registered Office**

ANNE BRIGGS WILLS  
 977 SEMINOLE TRAIL  
 #233  
 CHARLOTTESVILLE VA 22901  
 ALBEMARLE COUNTY 101  
 Status: Active  
 Effective Date: 6/23/2016

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